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April 29, 2021

VIA ECF

The Honorable Valerie E. Caproni
 Thurgood Marshall United States Courthouse
 Courtroom 443
 40 Foley Square
 New York, NY 10007

Re: Perks v. TD Bank, N.A., No. 18-CV-11176 (VEC)

Dear Judge Caproni:

Defendant TD Bank, N.A. ("TD Bank") and Plaintiffs Mary Jennifer Perks and Maria Navarro-Reyes write jointly to request a two-week extension for Plaintiffs to file their Motion for Preliminary Approval of Settlement and accompanying Written Settlement Agreement in the above-captioned matter. The parties notified the Court on February 2, 2021 that they had reached a settlement in principle that will resolve this putative class action in its entirety on a classwide basis. Pursuant to the Court's order of the same day, Plaintiffs' Motion for Preliminary Approval was to be due April 2, 2021. On March 31, 2021, the Parties respectfully requested an additional thirty days to finalize the settlement papers; the Court granted the request and set a deadline to file a preliminary approval motion by May 3, 2021.

However, and while the parties are working diligently and have exchanged drafts of the class settlement agreement and supporting materials that must be filed with Plaintiffs' Motion for Preliminary Approval, they require one additional extension to finalize the agreement, the proposed class notice protocol, and all supporting documents, and to obtain all necessary approvals to have the agreement executed. The parties, therefore, respectfully request an extension of the deadline for Plaintiffs to move for Preliminary Approval of the classwide settlement, thereby making Plaintiffs' motion due May 17, 2021. This is the parties' second request for extension of this deadline.

Respectfully submitted,

/s/ Jeffrey D. Kalief

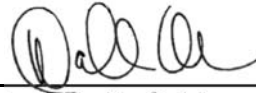
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Application GRANTED. The parties' new deadline is **May 17, 2021**. Further extensions are unlikely absent compelling circumstances.

SO ORDERED.



4/30/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE